



**NORTHWEST STRAITS**  
marine conservation initiative

February 2, 2012

Gerry O'Keefe, Executive Director  
Puget Sound Partnership  
326 E D Street  
Tacoma, WA 98421

RE: Comments on the Puget Sound Action Agenda

Dear Gerry:

The Northwest Straits Marine Conservation Initiative (Northwest Straits Initiative) supports the efforts of your agency in recovering Puget Sound. Our organization has actively participated in developing and carrying out the Puget Sound Action Agenda, and we appreciate the opportunity to comment on the draft update.

As you know, the Northwest Straits Initiative includes the Northwest Straits Commission, Marine Resources Committees (MRC) in seven counties, and a non-profit Foundation. Authorized by Congress, the organization represents a diversity of interests, cultural perspectives and expertise. We engage hundreds of citizens in stewardship through education and outreach; identify and prioritize local restoration projects; and conduct inventories and protection strategies for eelgrass, native shellfish, forage fish and shoreline habitats. We are also the lead organization conducting derelict fishing gear survey and removal operations, and documenting its impacts on marine life and habitats in Puget Sound.

Our comments are focused on:

1. Acknowledging the role that we play regionally to coordinate and support MRCs, implement regional restoration projects and expand regional stewardship through local MRCs.
2. Improving recognition for the work already carried out by the Northwest Straits Initiative in "on-going programs"
3. Identifying new appropriate Near Term Actions where we see a good nexus with our organizational capacity and expertise

We look forward to continued collaboration with the Puget Sound Partnership,

Sincerely,

A handwritten signature in cursive script, appearing to read "Ginny Broadhurst".

Ginny Broadhurst  
Director, Northwest Straits Commission

County Marine  
Resources  
Committees

Clallam  
Island  
Jefferson  
San Juan  
Skagit  
Snohomish  
Whatcom

In Cooperation with  
Participating Tribal  
Co-Managers

## **Acknowledging Northwest Straits Initiative as regional body**

### **Partnerships p. 277**

(Add) Northwest Straits Initiative as one of three 'important areas of broad collaboration' (currently only one – LIOs – is listed). We have the experience and ability to provide technical, strategic and other support at the local level.

### **Continue and Expand Stewardship p. 286 – 287**

Stewardship evolves from the local community as well as from a regional approach. Northwest Straits Initiative is a catalyst for locally-driven protection and restoration efforts involving hundreds of community volunteers who help change stewardship behavior, and should be explicitly recognized in this section of the document. WSU Beach Watchers is another organization that should be acknowledged in this section for its ability to expand stewardship at the local level.

### **Puget Sound Management Conference p. 468**

(Add) Northwest Straits Initiative

### **Diagram of Management Conference p. 469**

(Add) Northwest Straits Initiative to Implementation Section (as bubble with LIOs)

## **Comments related to our on-going work and new near term actions**

### **Climate Change in the Action Agenda: p. 17**

Northwest Straits Initiative proposes to take the lead in conducting community outreach on the issue of ocean acidification, in northern Puget Sound. The Northwest Straits Commission can serve as the touchstone to inform LIOs with or without an MRC.

### **Locally Developed Information in the Action Agenda: p. 20**

As written, this section does not acknowledge contributions from local entities such as the Northwest Straits Initiative provided prior to and during the formation of LIOs.

### **Nearshore and marine protection and restoration**

This section should acknowledge sea level rise that is expected to occur to varying degrees throughout Puget Sound. A change in sea level will affect decisions associated with shoreline planning, restoration, armoring and other issues.

### **p. 116**

*Ongoing Programs:* (Add) Northwest Straits Initiative as an entity that is providing information relevant to B1.1. Reconsider the current list of on-going programs which are more accurately regulations and codes, not programs.

*Near Term Action:* (Add) Northwest Straits Initiative will expand SoundIQ web application to streamline and improve availability of nearshore data for use by local and state governments and agencies. SoundIQ is a data platform that is being populated with data from several MRCs, county governments, and state agencies.

**p. 117 B 1.2**

*Ongoing Programs:* (Add) Northwest Straits Initiative, monitoring is a key component of work by MRCs in 7 counties.

*Near Term Action:* (Add) Continued monitoring of nearshore resources and habitats by Northwest Straits Initiative.

**p. 118 B1.3**

*Ongoing Programs:* (Add) Northwest Straits Initiative promotes stewardship, local community education programs and protection of nearshore habitats through the work of 7 MRCs and regional programs coordinated by the Northwest Straits Commission.

(Add) Marine Stewardship Areas established by local MRCs and partner organizations in Port Susan and San Juan county waters are on-going projects to raise community awareness to take actions to protect 'relatively intact ecosystems'.

Change 'Marine Recovery Councils' to Marine Resources Committees.

*Near Term Action:* (Add) Northwest Straits Initiative will hold workshops in 7 counties to educate residents and landowners about drift cells, shoreline geology, appropriate use of armoring and softshore alternatives.

**p. 123 B 2.1**

*Near Term Action:* (Add) Clallam and Jefferson MRCs as a mechanism for providing substantive public input on topics listed to county governments.

**p. 126 B 2.4**

*Ongoing Programs:* (Add) Northwest Straits Initiative through its Jefferson County MRC established voluntary no-anchor zones to protect eelgrass beds. (In Port Townsend, where rich eelgrass beds are close to city piers and docks, compliance is 99%.)

(Add) Northwest Straits Initiative as lead on eelgrass and other topical issues across Puget Sound Basin.

*Near Term Action:* Northwest Straits Initiative will continue to protect eelgrass beds through education, outreach, and no-anchor zones. Three new voluntary no-anchor zones to protect eelgrass beds will be established in other locations of Puget Sound.

**p. 127 B2.6**

*Ongoing Programs:* (Add) Northwest Straits Initiative, through its 7 MRCs, provides scientific and monitoring data and other information on local shoreline resources to local elected officials.

*Near Term Action:* (Add) Northwest Straits Initiative, through its 7 MRCs, will continue to collect local data and advise elected officials and planning departments.

Northwest Straits Initiative through 7 MRCs will act as convener around issues of local priority (i.e. bulkheads, setbacks, finfish aquaculture) in Shoreline Master Plan (SMP) updates

**p.136 B 3.1**

*Ongoing Programs:* (Add) Northwest Straits Initiative, through its 7 MRCs, identifies local shoreline restoration projects that are often carried out in partnership with non-profit organizations and public landowners.

*Near Term Action:* (Add) Northwest Straits Initiative will carry out local nearshore restoration projects with a goal of restoring 10,000 linear feet of shoreline.

**p. 139 B 3.3**

*Ongoing Programs:* As written this is not correct. The Northwest Straits Initiative is the lead organization doing derelict fishing gear removal in Puget Sound. NWSI works in coordination with WDFW to accomplish projects. DNR is not actively engaged with derelict gear removal.

*Near Term Action:* (Add) Northwest Straits Initiative will remove the remaining 500 nets in shallow water by the end of 2013.

Move section on derelict gear to species recovery. (Derelict net removal is a recommended action that is in state and federal rockfish recovery plans.)

**Protect and Recover Eelgrass**

This section should recognize the changes that may occur to eelgrass as a result of increasing acidity and increasing temperatures. It should also acknowledge that there is on-going loss of eelgrass beds that are not entirely understood.

**p. 149 B 6.1**

*Ongoing Programs:* (Add) Northwest Straits Initiative is well-positioned to provide the tools and the resources resulting from over a decade of successful eelgrass surveys and mapping in 7 counties to other parts of Puget Sound.

*Near Term Action:* (Add) Provide support to Northwest Straits Initiative to continue systematic monitoring of eelgrass beds in 7 counties. Data will be compiled in GIS database and provided to local and state permitting/planning agencies.

**p. 153 B 7.1**

*Near Term Action:* (Add) Port Susan Marine Stewardship Area is a mechanism to fill data gaps identified in this area of Puget Sound in 2011.

**p. 169**

Remove reference to derelict gear in notes, there is no association between derelict fishing gear and toxic clean up.

**p. 244**

Four MRCs are restoring Olympia oysters in partnership with Puget Sound Restoration Fund; in Clallam, Jefferson, Skagit and Whatcom counties. Restoration is in coordination with, but not led by, WDFW.

**p. 247 C9.5**

(Add) under implementing the Shellfish Initiative: The Northwest Straits Initiative was awarded \$200K to restore Olympia oysters, in partnership with Puget Sound Restoration Fund.

The Northwest Straits Initiative is well positioned to implement the Shellfish Initiative, by carrying out projects to improve local water quality near shellfish growing areas, restore native shellfish through out-planting, and increase awareness of recreational harvest opportunities.

**p. 253 C10.2.**

*Near Term Action:* Northwest Straits Initiative will provide a model for coordinating and training volunteers.

*Near Term Action:* Northwest Straits Initiative will hold HAZWOPER training in 7 counties.

**Leadership p. 275**

*Ongoing Programs:* (Add) Northwest Straits Initiative; through its Commission and MRC members.

*Near Term Action:* Northwest Straits Initiative will continue to serve as lead convener and facilitator of 1) derelict fishing gear removal and 2) forage fish protection.

**Science and Monitoring p. 282**

(Add) Northwest Straits Initiative will expand partnership with Washington Sea Grant to collect nearshore data needed to inform restoration efforts in 7 counties.

**p. 283 D4 1.1**

*Near Term Action:* (Add) Fund the publication of existing relevant data.

**D4 1.2**

*Ongoing Programs:* (Add) Northwest Straits Initiative.

**p. 290 D6**

*Ongoing Programs:* (Add) “Northwest Straits Initiative”

*Near Term Action:* Full funding of the Northwest Straits Initiative

(Delete) the first *Near Term Action*, unnecessary given the status of restoration efforts in this region.

**p. 293 D7.4**

*Near Term Action:* (Add) “In partnership with Northwest Straits Initiative” (training proposed is similar to the MRC-county government model that is already well established).

**Other comments on Action Agenda**

**p. 112**

The sentence "This chapter describes eight overarching strategies" should end in 'marine and nearshore ecosystems' (rather than upland and terrestrial)

**p. 114 B1**

Goal doesn't seem to fit with its tasks

MPAs don't fit under the theme for B1.1

MPAs should be listed under species recovery; they are a tool to restore marine life and habitats, and in Puget Sound the most appropriate use of MPAs currently is to restore rockfish species.

**p. 116**

Move explanation of PSNERP to the restoration section.

B2. Ensure that local governments conduct shoreline inventories to identify feeder bluffs, and restrict development and armoring of feeder bluffs.

**p. 127 B2.5**

Delete this section and put MPAs in one location, best to associate with rockfish recovery. MPAs are generally a deep water issue rather than strictly nearshore.

**p. 319, 385, and 387**

(Delete) 'Bay' following Port Susan

**p. 387, 389**

(Change) Port Susan Bay Planning Area to Port Susan Marine Stewardship Area

**p. 389, 390, 391, 392, and 394**

(Delete) 'Bay' from Port Susan Bay MSA (to read Port Susan MSA)